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November 3, 2012

GPT/BNSF Custer Spur EIS Co-Lead Agencies c/o CH₂M HILL 1100 112th Avenue NE, Suite 400 Bellevue, WA 98004

Dear U. S. Army Corps of Engineers, Whatcom County Planning Department and Washington Department of Ecology Representatives,

Thank you for the opportunity to comment on the scope of the Environmental Impact Statement (EIS) for the Proposed Gateway Pacific Terminal / Custer Spur. The proposed deepwater multimodal terminal in the Cherry Point area of Whatcom County will be designed to ship copious amounts of coal and other product and consequently, the building of this terminal and the associated BNSF Railway Custer Spur connection will greatly increase vessel traffic within the US and Canadian waters of the Salish Sea. While much of the EIS will focus on the terrestrial impacts of development as well as the nearshore impacts of developing the deepwater port, the EIS would be woefully incomplete if it did not also include examination of the probable impacts to the marine ecosystem in the regions where the vessels transiting to and from the port will travel, specifically, the marine waters of Whatcom, Skagit, San Juan, Jefferson, and Clallam Counties as well as the potentially impacted Canadian waters adjacent to and contiguous with the US waters mentioned.

The Salish Sea is approximately 17,000 square kilometers of marine water that is habitat to 37 species of mammals, 172 bird species, nearly 300 species of marine and anadramous fishes and over 3,000 macroinvertebrates. As of January 1, 2011, one or more jurisdiction within the region (British Columbia, Washington State, the US Federal Government or the Canadian Federal Government) has listed 113 of these species as threatened, endangered, of concern, or candidates for listing. The listing of nearly 33% of the mammal species, 33% of the bird species and 13% of the fish species suggests an ecosystem that is a non-resilient state of decay and is not in a good position to fare well from potential incremental stressors such as increased vessel noise or catastrophic events such as a major oil spill.

The marine waters of the Salish Sea are important culturally to the Tribes and First Nations of Washington and British Columbia and the areas non-native residents. These natural resources are also economically important to the people of the region. In addition to supporting the obvious subsistence, recreational and commercial fisheries, the watchable wildlife of the region support a \$2 billion / year



The SeaDoc Society

942 Deer Harbor Road, Eastsound, WA 98245 Phone: (360) 376-3910 Fax: (360) 376-3909 http://www.seadocsociety.org industry. This is money brought by residents of richer counties and cities into rural, less wealthy counties like San Juan, Jefferson and Clallam. The economic trade off of creating a few jobs in a more wealthy urban area like Bellingham needs to be weighted in light of the potential damage it could bring to both harvestable and watchable fish and wildlife resources of less economically well off rural counties.

I implore you to ensure that the scope of the EIS being developed for the proposed deepwater multimodal terminal in the Cherry Point area of Whatcom County also extend to the counties and regions where ships entering and leaving this proposed port would transit, including Clallam, Jefferson and San Juan County as well as to the waters and resources of neighboring British Columbia. The potential impact of increased vessel traffic needs to be evaluated in light of potential major stressors such as increased vessel-related noise, increased potential for a catastrophic oil spill, increased potential for vessel strike to marine birds and mammals, and increased pollution associated with the ship's marine diesel engines. These stressors should be evaluated for every species of concern, including candidate species that are not yet Federally listed by the U.S. or Canada. Risks also need to be considered for their potential economic impact to the marine ecosystem and the businesses and livelihoods they support. I appreciate you including these factors in the draft EIS and look forward to reviewing it when it becomes available.

Sincerely.

Joseph K. Gaydos, VMD, PhD

Chief Scientist and Wildlife Veterinarian

UC Davis Wildlife Health Center - Orcas Island Office

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